

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498
LOS ANGELES • PALO ALTO • WASHINGTON, D.C.
FRANKFURT • LONDON • PARIS

Via ECF

October 24, 2014

Hon. Denise L. Cote,
United States District Judge,
500 Pearl Street, Room 1610,
New York, NY 10007-1312.

Re: FHFA v. Nomura Holding America, Inc., No. 11-cv-6201 (S.D.N.Y.)

Dear Judge Cote:

I write on behalf of the Nomura and RBS defendants regarding proposed redactions to certain materials that they will file later today in opposition to plaintiff's October 14 Motions *in Limine* on housing goals, time of sale, and Freddie Mac's and Fannie Mae's automated underwriting systems. Several exhibits to each of defendants' three opposition briefs have been designated by plaintiff as "Confidential" under the First Amended Protective Order, dated January 11, 2013, and defendants are therefore filing this document under seal, pursuant to Paragraph 9 of that Order.

In order to give plaintiff the opportunity to review the documents, defendants respectfully request that the parties be given (a) until October 31 to meet and confer regarding proposed redactions, and (b) until November 7 to file a joint submission listing the agreed-upon redactions, as well as any redactions to which a party objects. Plaintiff consents to this proposed schedule.

Respectfully submitted,

/s/ David B. Tulchin

David B. Tulchin